

## UNITED STATES DISTRICT COURT

for the

Eastern District of Pennsylvania

United States of America  
v.

Case No. 23-MJ-873

BILLY FRANKLIN ALEXANDER

*Defendant(s)*

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of April 22, 2023 in the county of Philadelphia in the  
Eastern District of Pennsylvania, the defendant(s) violated:*Code Section*

18 U.S.C. Section 111(a)(1)

*Offense Description*

Assault on an Officer in the Performance of Official Duties (2 counts)

This criminal complaint is based on these facts:

On or about April 22, 2023, at 322 Market Street, in Philadelphia, Pennsylvania, the defendant knowingly and intentionally assaulted, resisted, opposed, impeded, intimidated and interfered with Park Ranger H.E and T.B in the performance of their duties by striking H.E. and T.B. as the defendant resisted arrest, in violation of 18 U.S.C. Section 111(a)(1).

☒ Continued on the attached sheet.Attested to by the complainant in accordance with the  
requirements of Fed. R. Crim. P. 4.1 by telephone.

Date: \_\_\_\_\_

City and state: Philadelphia, Pennsylvania/s/ Brian Przystawski*Complainant's signature*BRIAN PRYZSTAWSKI, National Park Service*Printed name and title*Digitally signed by  
ETH Signature

Date: 2023.04.29

11:16:37 -04'00'

*Judge's signature*Elizabeth T. Hey, U.S. Magistrate Judge*Printed name and title*

**AFFIDAVIT**

I, BRIAN R. PRZYSTAWSKI, being duly sworn, do hereby state:

1. I have been employed as a sworn, commissioned National Park Service (NPS) Ranger for approximately 15 years. I am currently employed as the Law Enforcement Specialist (LES) at Independence National Historical Park (INDE).
2. Any facts stated within this affidavit were witnessed by myself or another sworn, commissioned NPS Ranger.
3. Based upon my review of closed camera television footage, body worn camera footage, and the NPS investigation, and on the basis of the above noted sources of information, I submit that the facts contained in the paragraphs below demonstrate that there is probable cause to believe that, on or about April 22, 2023, in Philadelphia, Pennsylvania, BILLY F. ALEXANDER (ALEXANDER), date of birth December 4, 1980, knowingly and intentionally:

assaulted, resisted, opposed, impeded, intimidated, and interfered with an officer of the United States, as designated in Title 18, United States Code, Section 1114, that is, National Park Service Ranger H.E.<sup>1</sup>, while Ranger H.E. was engaged in the performance of his official duties, in violation of Title 18, United States Code, Section 111(a)(1).

- a. assaulted, resisted, opposed, impeded, intimidated, and interfered with an officer of the United States, as designated in Title 18, United States Code, Section 1114, that is, National Park Service Ranger T.B.<sup>2</sup>, while Ranger T.B. was engaged in the performance of his official duties, in violation of Title 18, United States Code, Section 111(a)(1).
4. On or about April 22, 2023, ALEXANDER stood in front of the doorway at 322 Market Street, Philadelphia, PA, 19106, in the Eastern District of Pennsylvania. As Ranger H.E. was leaving the Ben Franklin Print Shop, a unit of the Independence National Historic Park, located at 322 Market Street, Philadelphia, he opened the door and was immediately hit on the head by ALEXANDER. Ranger H.E. staggered from the blow to the head causing his hat to fall. After striking Ranger H.E., ALEXANDER began to verbally attack Ranger H.E. Once Ranger H.E. was able to leave the location of the attack, he called National Park Service dispatch and requested assistance.
5. NPS commissioned Rangers T.B. and D.P. arrived to help Ranger H.E. who identified ALEXANDER as the person who assaulted him. Rangers T.B. and D.P. followed

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<sup>1</sup> The identity of T.B. is known to the government and will be provided to the Court upon request.

<sup>2</sup> The identity of H.E. is known to the government and will be provided to the Court upon request.

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ALEXANDER to the intersection of 2<sup>nd</sup> Street and Market Street, where ALEXANDER was in the middle of the street. Ranger T.B. told ALEXANDER that he had to speak to him. ALEXANDER ignored him and walked away. Ranger D.P. told ALEXANDER to get out of the road multiple times. Rangers T.B. and D.P. then restrained ALEXANDER to place him under arrest.

6. Rangers T.B. and D.P. each grabbed one of ALEXANDER'S arms. ALEXANDER pulled his arms away and yelled "you are not the police." ALEXANDER began to actively resist arrest by struggling and fighting with the law enforcement officers.
7. As Rangers T.B. and D.P. continued to struggle with ALEXANDER, Ranger T.B fell to the ground and ALEXANDER fell on top of Ranger T.B.'s right leg. During the struggle, T.B.'s ankle was fractured. While Ranger T.B. was on his back, ALEXANDER attempted to strike him multiple times. While on the ground, ALEXANDER wrapped his legs around Ranger T.B. Eventually, Philadelphia Police Department arrived to provide additional assistance and ALEXANDER was handcuffed and arrested.
8. Ranger T.B. has had two surgeries to stabilize his ankle and spent five days hospitalized receiving treatment for his injuries.
9. Based upon the facts set forth above, I request an arrest warrant for BILLY F. ALEXANDER, charging him with two counts of assault on a Federal officer in the performance of official duties, each in violation of 18 U.S.C. section 111(a)(1).

/s/ Brian R. Pryzstawski

BRIAN R. PRYZSTAWSKI  
United States Park Ranger  
National Park Service

Sworn and subscribed to before me this the \_\_\_\_\_ day of April of 2023 in Philadelphia, Pennsylvania.

Digitally signed by  
ETH Signature  
Date: 2023.04.29  
EL \_\_\_\_\_ 11:18:49 -04'00'  
UNITED STATES MAGISTRATE JUDGE